

**Objective Criteria Review Memo ADDENDUM - Mallard Exploration LLC
Harlequin 33-32-2HN -- Form 2 Application for Permit to Drill (APD) Doc# 402438329**

Approved Form 2A Oil & Gas Location Assessment (Harlequin North Pad Doc# 401502121, approved 6/21/2018)

Location ID# 455576

The Form 2A for this Oil & Gas Location was reviewed for all wells proposed for this Location. COGCC's technical review of recently approved refile APDs included review within the context of SB 19-181 and the required Objective Criteria. Objective Criteria Review Memo, Doc# 1347966, is in the Location's file in COGCC's database. This Addendum provides additional information regarding the delayed approvals of the six APDs permitted at this Location.

Delayed Approval of APDS:

The Form 2A was approved on 6/21/2018. The most recently approved refile APDs were approved on 9/16/2020. These APDs did not pass Completeness until 9/15/2020.

The Objective Criteria Review Memo for this location (Doc# 1347966) identified that this location met Criteria #8 for being planned for 16 oil tanks and eight water tanks. The Objective Criteria Review Memo identified BMPs on the Form 2A that should successfully mitigate against the impacts identified by meeting Criteria #8, including: remote monitoring/shut-in capabilities, lined containment, and an emergency response plan with local emergency responders. Based on the existing BMPs, there is no further action needed beyond what was identified in the on-file Objective Criteria Review Memo.

Based on this analysis, the Operator is complying with the existing BMP's and COA's on the approved Form 2A to address the Objective Criteria that were met during the original review of the Form 2A and no further Sundry or Memo is necessary at this time. The APD's IN PROCESS should be passed and sent to Final Approval with the following comment:

The Form 2A #401502121 for the location, ID #455576, was approved prior to implementation of SB 19-181. The Director approved a refile Form 2 for the location on 9/16/2020 under the statutory authority provided through SB 19-181, including the Objective Criteria. The well proposed by this related Form 2 was contemplated during COGCC's review of the Form 2A and the mitigation measures that were applied during the subsequent Objective Criteria Review for the location. The Objective Criteria Review Memo (Doc# 1347966) can be found in the document file for this Location.